

United States District of Court  
Middle District of Tennessee

Exhibit B

Craig Cunningham  
Plaintiff, Pro-se

V.

Civ Action 3:15-cv-00847

Enagic USA, Inc.  
Defendant

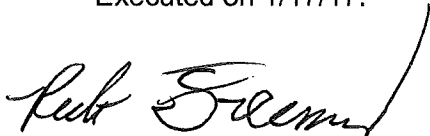
**RECEIVED  
IN CLERK'S OFFICE**

JAN 24 2017

**U.S. DISTRICT COURT  
MID. DIST. TENN.**

**Defendant's Affidavit Against the Plaintiff's Motion for Summary Judgment**

1. My name is Rick Freeman and I am one of the Defendant's in this case. I am over the age of 18 and have never been convicted of a felony or crime of moral turpitude.
2. I am writing this affidavit against the Plaintiff's Motion for Summary Judgment.
3. I have never contacted the Plaintiff at his cell phone number, 615-212-9191.
4. I deny pitching the products of Enagic and an elaborate get-rich-quick pyramid scheme named SSM or the secret success machine as accused by the Plaintiff.
5. I deny any and all accusations made against me, Rick Freeman, by the Plaintiff, Craig Cunningham. I certify under the penalty of perjury that the foregoing is true and correct.  
Executed on 1/17/17.



Rick Freeman  
Defendant

3040 Oasis Grand Blvd. Unit # 801  
Fort Myers, FL 33916

**United States District of Court  
Middle District of Tennessee**

Craig Cunningham  
Plaintiff, Pro-se

**V.**

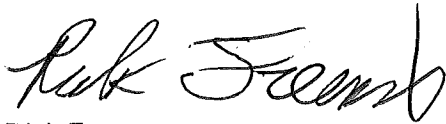
Civ Action 3:15-cv-00847

Enagic USA, Inc.  
Defendant

**Defendant's Certificate of Service**

I hereby certify that on 1/17/17, the foregoing was sent via USPS First class mail to:

Craig Cunningham 5543 Edmondson Pike, ste 248 Nashville, TN 37211

A handwritten signature in black ink, appearing to read "Rick Freeman". The signature is fluid and cursive, with the first name "Rick" and last name "Freeman" clearly distinguishable.

*Rick Freeman*  
Defendant

3040 Oasis Grand Blvd. Unit # 801  
Fort Myers, FL 33916  
10/17/17